

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

COALITION FOR OPEN DEMOCRACY,
et al.,

Plaintiffs,

v.

DAVID M. SCANLAN, in his official
capacity as New Hampshire Secretary of
State,

Defendant.

Case No. 1:24-cv-00312-SE-TSM

**[ASSENTED TO] MOTION FOR ADMISSION PRO HAC VICE OF
GILBERT C. DICKEY**

Pursuant to Local Rule 83.2(b), Richard J. Lehmann of the law firm Lehmann Major List, PLLC moves this Court to enter an order authorizing Gilbert C. Dickey, counsel for Amici the Republican National Committee and the New Hampshire Republican State Committee, to be admitted pro hac vice to represent Amici in this case. In support of this Motion, Movant states as follows:

1. Movant is a member in good standing of the bars of the U.S. District Court of New Hampshire and State of New Hampshire. Movant is in good standing with all courts in which he is admitted and has never been the subject of a disciplinary proceeding as a practicing attorney.
2. Mr. Dickey is not a member of the New Hampshire Bar. However, he is a member in good standing of the North Carolina State Bar and the United States District Court for the Western District of North Carolina. Mr. Dickey has never been the subject of a disciplinary proceeding as a practicing attorney.
3. Movant requests this Court to enter an order authorizing Mr. Dickey to be admitted pro hac vice to appear and practice before this Court as counsel to the Republican National

Committee and the New Hampshire Republican State Committee. Attorney Dickey will abide by all rules of this Court unless waived with the Court's permission.

4. This Motion is being served upon every party that has entered an appearance in this case.
5. This motion is supported entirely by the accompanying affidavit and the points made above, and therefore does not require a memorandum pursuant to Local Rule 7.1(a)(2).
6. Counsel for the Plaintiffs assents to this motion.
7. At the time of filing of this motion, movant has not received a response concerning the assent or objection from the Defendants.

WHEREFORE, Movant requests that this Court enter an Order:

1. Granting Movant's Motion to admit Gilbert C. Dickey, pro hac vice;
2. Finding that notice of this Motion as set forth in paragraph four (4) above is sufficient and proper under the circumstances; and
3. Granting Movant such other and further relief as is just and equitable.

Dated: March 21, 2025

Respectfully submitted,

/s/ Richard J. Lehmann

Richard J. Lehmann
(Bar No. 9339)
6 Garvins Falls Road
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Counsel for Amici

CERTIFICATE OF CONCURRENCE

Pursuant to Local Rule 7.1(c), I hereby certify that a good faith attempt has been made to obtain concurrence in the relief sought and that Plaintiff and the Secretary assent to this motion.

/s/ Richard J. Lehman

CERTIFICATE OF SERVICE

I CERTIFY that on March 21, 2025, I electronically filed this document with the Clerk of Court by using the CM/ECF system, which will send a notice of electronic filing to all counsel of record.

/s/ Richard J. Lehmann

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**AFFIDAVIT IN SUPPORT OF MOTION FOR ADMISSION PRO HAC VICE OF
GILBERT C. DICKEY**

I, Gilbert C. Dickey, make this affidavit in support of the motion for my admission to appear and practice in this Court in this case as counsel pro hac vice for the Republican National Committee and the New Hampshire Republican State Committee under Local Civil Rule 83.2(b)(1). I, Gilbert C. Dickey, being duly sworn, state:

1. I am a partner at the law firm Consovoy McCarthy PLLC.
2. My office address, email address, and telephone number are as follows:

1600 Wilson Boulevard, Suite 700,
Arlington, Virginia 22209
gilbert@consovoymccarthy.com
(703) 243-9423

3. I am admitted to practice in the following courts:

Alabama (9/28/12); West Virginia (5/13/15); District of Columbia (12/2/19); North Carolina (10/8/21); United States Court of Appeals for the Eleventh Circuit (7/29/14); United States Court of Appeals for the Fourth Circuit (10/19/15); United States Court of Appeals for the Fifth Circuit (2/13/19); United States Court of Appeals for the Ninth Circuit (5/10/19); United States Court of Appeals for the Third Circuit (9/4/20); United States Court of Appeals for the Seventh Circuit (11/27/20); United States Court of Appeals for

the Second Circuit (12/9/20); United States Court of Appeals for the District of Columbia Circuit (3/10/21); United States District Court for the Northern District of West Virginia (5/11/16); United States District Court for the Southern District of West Virginia (5/13/15); United States District Court for the Western District of North Carolina (3/14/22); United States District Court for the Middle District of North Carolina (1/8/25); Supreme Court of the United States (6/21/21).

4. I am in good standing and eligible to practice in the above listed courts.
5. I am not currently suspended or disbarred in any jurisdiction.
6. I have never been denied admission to practice before any court. There are no previously imposed or pending disciplinary matters in which I am involved. I do not have any prior felony or misdemeanor criminal convictions.
7. I do not have any prior final denials or revocations of pro hac vice status in any court. Any motions denied or revoked were accepted after correction.

I declare under penalty of perjury that the foregoing is true and accurate.

Dated: March 21, 2025

Respectfully submitted,

/s/ Gilbert C. Dickey

Gilbert C. Dickey
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[PROPOSED] ORDER

Now, on this ____ day of December, 2024, upon consideration of the Motion For Admission Pro Hac Vice filed by Gilbert C. Dickey to be admitted and take part in this case as counsel pro hac vice to Amici the Republican National Committee and the New Hampshire Republican State Committee, and it appearing that Mr. Dickey is a duly admitted member of the bar in good standing, IT IS HEREBY ORDERED that Gilbert C. Dickey be admitted to the bar of this Court pro hac vice for the purpose of representing Amici.

Honorable Samantha D. Elliot
United States District Judge